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BEFORE THE ARIZONA CORPORATION COMMISSION

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MIKE GLEASON
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2004 AUG -2 P 4: 12

Arizona Corporation Commission

DOCKETED

AUG 02 2004

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IN THE MATTER OF THE NOTICE OF
PROPOSED RULE MAKING REGARDING
THE TRANSPORTATION OF NATURAL
GAS, OTHER GASES AND HAZARDOUS
LIQUIDS BY PIPELINES

) DOCKET NO. RG-00000A-04-0169

) UNS GAS, INC. COMMENTS

UNSGas, Inc. hereby submits its comments related to Staff's proposed amendments to the Arizona Corporation Commission's (Commission) Pipeline Safety Rules, A.A.C. R14-5-202 through A.A.C. R14-5-205. UNS Gas generally supports the proposed amendments, and is only commenting on one section, R14-5-202(S).

In this section, the proposed rule states that an operator must report a pipe failure to the Commission's Office of Pipeline Safety. For clarification purposes, UNS Gas proposes that the following language be added to R14-5-202(S)(1):

If an operator of an intrastate natural gas, other gas, or hazardous liquid pipeline removes a portion of a pipeline that failed for any reason other than observable external corrosion or third party damage, improper installation, poor workmanship, and manufacturing defect, the operator shall retain the portion that was removed and shall notify the Office of Pipeline Safety of the removal within two hours after the removal is complete.

UNSGas believes that this additional language will provide clarity as to the types of failures that do not need to be reported to the Commission Office of Pipeline Safety.

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RESPECTFULLY SUBMITTED this 2nd day of August 2004.



By
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ORIGINAL + 15 COPIES of the foregoing
filed August 2nd, 2004, with:

Docket Control
ARIZONA CORPORATION COMMISSION
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Phoenix, Arizona 85007

By Mary Ippolito

Copy of the foregoing hand-delivered/mailed
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To all Parties in the Docket